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February 24, 2017

VIA ECF

Hon. Michael A. Shipp, U.S.D.J.
United States District Court
District of New Jersey
402 East State Street
Trenton, NJ 08608

**Re: Wang, et al. v. Chapei, LLC et al. Case No. 15-cv-02950
Requesting Leave, and Extension of Time, to File Motion for Conditional
Certification of Collective**

Your Honor,

We represent the Plaintiffs in the above-captioned matter. Pursuant to this Court's order of November 15, 2016, D.E. 45, we write to request leave to file a Motion for Conditional Certification of Collective, and an extension of the filing deadline to March 13, 2017.

The November 15 Order set a deadline for filing our Motion for Conditional Certification of Collective thirty (30) days after Judge Arpert's Order denying our Motion for Reconsideration. Judge Arpert issued his order on January 27, 2017. The November 15 order therefore set our deadline to file our Motion for Conditional Certification of Collective on February 26, 2017.

On December 23, 2016, however, prior to Judge Arpert's order, prior local counsel in this case, Lina Franco, entered a motion to withdraw from representation. D.E. 46. It was not until February 13, 2017 that Michael Taubenfeld appeared as local counsel to substitute for the withdrawn Ms. Franco. D.E. 48. Since February 13, John Troy has been working diligently to bring Mr. Taubenfeld up to speed on the case, and simultaneously to update our motion to comply with the *Zavala* standard called for in the November 15 order. However, we require a small extension of time in which to do so.

We thank the court for its time and consideration on this matter.

Dated: New York, NY
February 24, 2017

Respectfully submitted,

/s/ Michael Taubenfeld
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